

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Fort Myers Broadcasting Company)	ULS File No. 0008282472
)	
Application for a New Weather Radar Station)	
to Operate in the 3500-3550 MHz Band)	

INFORMAL OBJECTION OF THE WIRELESS INNOVATION FORUM

Pursuant to Section 1.41 of the rules of the Federal Communications Commission (“Commission”) rules, the Wireless Innovation Forum (WInnForum)¹ submits its informal objection to the above-captioned application of Fort Myers Broadcasting Company for a new weather radar station in Punta Gorda, Florida, in the 3500-3550 MHz band. WInnForum agrees with CTIA that the “risk of interference from Fort Myers Broadcasting’s proposed high-power weather radar station into CBRS is significant and merits return of the Application.”²

As the WInnForum has previously explained, “there is tremendous uncertainty caused by high-power radar system operations up to the 3550 MHz band edge. In particular, the power levels and rolloff characteristics of adjacent band weather radar systems will pose challenges to CBRS operations in the 3.5 GHz band. Out-of-band emissions (OOBE) from the radar systems into the adjacent CBRS band are sufficiently high to result in base station shut down or even

¹ WInnForum represents an international group of stakeholders who share the common business interests of advancing technologies supporting the innovative utilization of spectrum and the development of wireless communications systems, including essential or critical communications systems. With respect to 3.5 GHz and CBRS, WInnForum addresses all aspects of standardization for CBRS entities, including radio technology-agnostic aspects of CBRS operation and all aspects of three-tier spectrum management, incumbent protection, operations, and operational/communication security for CBRS.

² Informal Objection of CTIA, ULS File No. 0008282472 (filed Aug. 14, 2018).

damage. And these high-power radar systems are even more likely to cause improper operation of Environmental Sensor Capability (ESC) detection networks designed to detect the presence of military radar and alert the SAS Administrators CBRS operations must be shut down in the affected areas.”³

As the Commission is well aware, the entire industry is anticipating Initial Commercial Deployment of the CBRS band later this year.⁴ To provide CBRS users and ESC Operators certainty and assure investment in the band, the WinnForum asks the Commission to deny the Application of Fort Myers Broadcasting Company and to initiate a freeze on all weather radar applications in the 3450-3550 MHz band.

Respectfully submitted,

/s/ Lee Pucker

Lee Pucker

Chief Executive Officer

Wireless Innovation Forum

August 27, 2018

³ Comments of the Wireless Innovation Forum, GN Docket No. 12-254, RM-11788, RM-11789, at 4 (filed July 24, 2017).

⁴ See WIRELESS TELECOMMUNICATIONS BUREAU AND OFFICE OF ENGINEERING AND TECHNOLOGY ESTABLISH PROCEDURE AND DEADLINE FOR FILING SPECTRUM ACCESS SYSTEM INITIAL COMMERCIAL DEPLOYMENT PROPOSALS, GN Docket No. 15-319, DA 18-783 (released July 27, 2018)